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*Attorneys for Defendant Talkiatry
Management Services, LLC*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JANE DOE, individually and on behalf
of others similarly situated,

Plaintiff,

v.

TALKIATRY MANAGEMENT
SERVICES, LLC

Defendant.

CASE NO. 5:25-cv-00781

**JOINT STIPULATION TO MODIFY
BRIEFING SCHEDULE FOR
DEFENDANT'S MOTION TO
DISMISS PLAINTIFF'S PUTATIVE
CLASS ACTION COMPLAINT (Dkt.
11)**

*[[Proposed] Order Filed Concurrently
Herewith]*

Complaint Served: April 7, 2025
Motion to Dismiss Filed: May 28, 2025
Hearing: September 12, 2025

Ballard Spahr LLP
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JOINT STIPULATION

Defendant Talkiatry Management Services, LLC (“Talkiatry”) and Plaintiff Jane Doe (“Plaintiff”), by and through their attorneys, hereby stipulate to modify the briefing schedule for Talkiatry’s anticipated motion to dismiss Plaintiff’s putative class action complaint (the “Complaint”). In support of this Stipulation, the Parties state as follows:

WHEREAS, on March 27, 2025, Plaintiff initiated this putative class action (Dkt. 1);

WHEREAS, Defendant’s current deadline to respond to Plaintiff’s Class Action Complaint (“Complaint”) is currently May 28, 2025;

WHEREAS, Defendant has filed a motion to dismiss Plaintiff’s Complaint (Dkt. 11) (the “Motion”);

WHEREAS, the Parties have agreed to extend the deadlines to file their opposition to and reply in support of the Motion; and

WHEREAS, the Parties agree that the requested briefing schedule will not prejudice either party or result in undue delay, and it will be in the interests of judicial economy. Thus, the Parties respectfully submit that good cause supports these extensions due to the number of issues to be addressed in the Motion.

NOW THEREFORE, the Parties agree, subject to the Court’s approval, to the following briefing schedule for the Motion:

Opening Brief: May 28, 2025

Opposition: July 25, 2025

Reply: August 25, 2025

**Hearing: September 12, 2025,
or as soon thereafter as convenient for the Court.**

IT IS SO STIPULATED.

1 DATED: May 30, 2025

Respectfully submitted,

2
3 **SWIGART LAW GROUP, APC**
4 **BEN TRAVIS LAW, APC**

BALLARD SPAHR LLP

5 BY: /s/ Joshua B. Swigart
6 Joshua B. Swigart
Ben Travis

BY: /s/ Brianna R. Howard
Scott S. Humphreys
Brianna R. Howard

7 *Attorneys for Plaintiff Jane Doe*

*Attorneys for Defendant Talkiatry
Management Services, LLC*

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1 I, Brianna R. Howard, attest pursuant to L.R. 5-4.3.4(a)(2)(i) that Talkiatry
2 Management Services LLC, on whose behalf the filing is submitted, concurs in the
3 filing's content and has authorized the filing.

4
5 DATED: May 30, 2025

Respectfully submitted,

6 **BALLARD SPAHR LLP**

7 BY: /s/ Brianna R. Howard

8 Scott S. Humphreys

Brianna R. Howard

9 *Attorneys for Defendant Talkiatry*
10 *Management Services, LLC*

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of May, 2025, I electronically filed a true and correct copy of the foregoing **JOINT STIPULATION TO MODIFY BRIEFING SCHEDULE FOR DEFENDANT'S MOTION TO DISMISS (Dkt. 11)** through the Court's CM/ECF system, which will send a notice of electronic filing to the following:

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